

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**NOTICE OF PENDENCY OF CLASS ACTION**

**You are receiving this notice because in 2011 you requested a disclosure of your Trans Union LLC (“TransUnion”) file and were sent a letter from TransUnion with information concerning the Office of Foreign Assets Control (“OFAC”). The Court authorized this notice. This is not a solicitation from a lawyer. You are not being sued. Please do not telephone the Court or TransUnion.**

**1. Background and Information**

Sergio Ramirez filed a class action lawsuit against TransUnion relating to how OFAC information and your rights under the Fair Credit Reporting Act (“FCRA”) were disclosed to you and also relating to the inclusion of OFAC data on credit reports. The lawsuit is filed under FCRA and the California Consumer Credit Reporting Agencies Act. TransUnion denies the plaintiff’s allegations and contends that it obeyed the law.

The Court has not decided who is right or wrong. The Court has allowed the lawsuit to proceed as a “class action” on behalf of individuals who fit the class definition set forth below. There is no money or other benefits available now, and no guarantee that there will be.

**YOUR LEGAL RIGHTS ARE AFFECTED BY THIS LAWSUIT AND YOU HAVE A CHOICE TO MAKE NOW.**

**Choice 1 – DO NOTHING – STAY IN THIS CLASS ACTION**

If you do nothing, you will preserve your chance to recover money or other benefits in this class action, if there are any, in exchange for giving up your rights to bring your own lawsuit on the issues raised in this class action.

**Choice 2 – OPT OUT OF THIS CLASS ACTION – REQUEST EXCLUSION**

You have the right to request exclusion (“opt out”) of this class action. This will give up your chance to recover money or other benefits in this class action, if there

are any, in exchange for preserving any rights you may have to bring your own lawsuit on the issues raised in this class action. **THE DEADLINE FOR REQUESTING EXCLUSION IS \_\_\_\_\_, 2015.** *[calendar date to be inserted: 45 days after mailing]*

## 2. Who Is in the Class?

The Court has defined the following “Class” to be part of the lawsuit: “All natural persons in the United States and its Territories to whom Trans Union sent a letter similar in form to the March 1, 2011 letter Trans Union sent to Plaintiff regarding ‘OFAC (Office of Foreign Assets Control) Database’ from January 1, 2011 to July 26, 2011.” TransUnion’s records indicate that you are a member of the Class.

## 3. What is the Lawsuit About?

Plaintiff claims that TransUnion misinformed consumers about the contents of their files and failed to tell them about their rights to dispute any inaccurate OFAC information and have it corrected, allegedly in violation of 15 U.S.C. § 1681g.

Plaintiff also claims that TransUnion failed to use reasonable procedures designed to ensure maximum possible accuracy when preparing reports with OFAC data, allegedly in violation of 15 U.S.C. § 1681e(b).

Plaintiff also is seeking an order under California law relating to the handling of OFAC data, based on alleged violations of Cal. Civ. Code §§ 1785.10, 1785.14 & 1785.15.

TransUnion denies all allegations of wrongdoing. The Court has not decided who is right or wrong.

## 4. What is a Class Action?

A class action is a lawsuit in which the claims and rights of many similarly-situated people (“Class Members”) are decided in a single court case. The Court has appointed Sergio Ramirez as the representative of all the Class Members. The judgment in this case will have a binding effect on all Class Members who do not

request exclusion before the \_\_\_\_\_, 2015, deadline. *[calendar date to be inserted: 45 days after mailing]*

5. What Is the Plaintiff Asking for on Behalf of the Class Members?

The Plaintiff is asking the Court to award between \$100 and \$1,000 in damages to each Class Member for each violation that is proven, as well as punitive damages, attorneys' fees and costs. The Plaintiff is also asking for an order under California law relating to how OFAC data should be handled in the future.

6. Is Any Money Available Now?

No. If money and/or benefits become available, you will receive additional notice about how to receive any share to which you may be entitled. There is no way to predict whether or when any money ever might be available, because even after a trial, appeals may occur.

7. What Happens if I Do Nothing at All?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. By doing nothing you stay in the Class. If you stay in the Class and the Plaintiff obtains money or benefits, either as a result of the trial or a settlement, you will be notified about how to apply for a share. Keep in mind that if you do nothing now, regardless of whether the Plaintiff wins or loses the case, you will not be able to sue, or continue to sue, TransUnion about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all of the orders the Court issues and judgments the Court makes in this class action, and you will be deemed to consent to the entry of a final judgment by a magistrate judge.

8. How Do I Request Exclusion From the Class ("Opt Out")?

You have the right not to participate in this case. The court will exclude from the Class any member who requests exclusion. To request exclusion ("opt out") from the Class, you must write or email \_\_\_\_\_ at \_\_\_\_\_ by \_\_\_\_\_, 2015. Your letter or email must include your name, address and

the following statement: “I request to be excluded from the Sergio Ramirez v. TransUnion lawsuit.” *[Independent Notice Administrator details and calendar date for opt-out deadline to be added]*

9. Do I Have a Lawyer In This Case?

You have the right to enter an appearance in this case with an attorney of your own choosing if you so desire.

The Court has appointed the law firms of Francis & Mailman, P.C. and Anderson Ogilvie & Brewer LLP as “Class Counsel.” Their contact information is:

FRANCIS & MAILMAN, P.C.  
100 S. Broad Street, 19th Floor  
Philadelphia, PA 19110  
(215) 735-8600  
[www.consumerlawfirm.com](http://www.consumerlawfirm.com)

ANDERSON, OGILVIE & BREWER LLP  
235 Montgomery Street, Suite 914  
San Francisco, CA 94104  
(415) 651-1952  
[www.califcreditlaw.com](http://www.califcreditlaw.com)

You are not required to pay Class Counsel any money. If Plaintiff wins the lawsuit or if there is a settlement, Class Counsel will file an application for their fees and reimbursement of their costs.

10. Has a Trial Been Scheduled?

A trial has been scheduled for November 16, 2015. Please note that trial dates are sometimes rescheduled. Additionally, sometimes trials do not occur because the case is decided by motions or because of a settlement. If the trial occurs, you are not required to attend.

11. Who Is Presiding Over the Case?

United States Magistrate Judge Jacqueline Scott Corley is the assigned judge. Plaintiff and TransUnion have agreed that she may preside over any trial and enter a final judgment. If you object to having a magistrate judge preside over this case and enter a final judgment that will bind you and that will finally determine your rights, then you should request exclusion from the Class.

14. How Do I Get More Information?

Additional information is at the following website \_\_\_\_\_.

You also may email Class Counsel at \_\_\_\_\_ or telephone them at \_\_\_\_\_. *[Website/email/telephone information to be added]*

The Court filings may be examined at the Office of the Clerk at \_\_\_\_\_

between the hours of \_\_\_\_\_ and \_\_\_\_\_ or via the PACER electronic system.

There is a charge to review documents via PACER; please see \_\_\_\_\_ for additional information. *[Information re public access to case documents to be added]*

**PLEASE DO NOT TELEPHONE TRANSUNION OR THE COURT.**

By Order of the United States District Court for the Northern District of California.

Dated: \_\_\_\_\_, 2015